UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DERRICK, by and with his parent and next friend TINA, et al.,

Plaintiffs,

Case No. 2:19-cv-01541-HB

v.

GLEN MILLS SCHOOLS, et al.,

Defendants.

JOINT MOTION OF PLAINTIFFS AND DEFENDANT CHESTER COUNTY INTERMEDIATE UNIT TO VOLUNTARILY DISMISS CLAIMS AND CROSSCLAIMS PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE RULE 41 (A)(2)

Plaintiffs hereby move to voluntarily dismiss their claims against Defendant Chester County Intermediate Unit ("CCIU") and Defendant CCIU seeks to voluntarily dismiss its crossclaim against Defendant Glen Mills Schools. In support of this motion, Plaintiffs and CCIU incorporate the accompanying memorandum of law.

Dated: January 25, 2023 Respectfully submitted,

/s/ Maura McInerney

Maura McInerney Kristina A. Moon Margaret M. Wakelin EDUCATION LAW CENTER 1800 JFK Blvd., Suite 1900A Philadelphia, PA 19103 (215) 238-6970

Marsha Levick Katherine E. Burdick Nadia Mozaffar Malik Pickett JUVENILE LAW CENTER 1800 JFK Blvd., Suite 1900B Philadelphia, PA 19103

(215) 625-0551

Fred T. Magaziner
Michael H. McGinley
Clare Putnam Pozos
Caroline Power
Roger A. Dixon
DECHERT LLP
Cira Centre
2929 Arch Street
Philadelphia, PA 19104-2808
(215) 994-4000

Attorneys for Plaintiffs

/s/ Andrew E. Faust

Andrew E. Faust – PA 47367 Jason D. Fortenberry – PA 311397 SWEET STEVENS KATZ & WILLIAMS LLP 331 East Butler Avenue, POB 5069 New Britain, Pennsylvania 18901 (215) 345-9111

Attorneys for Defendant/Cross Claimant Chester County Intermediate Unit